



London Borough of Hammersmith & Fulham

OVERVIEW & SCRUTINY BOARD 28 JANUARY 2014

INDIVIDUAL ELECTORAL REGISTRATION

Report of the Bi-Borough Director of Law

Open Report

Classification: For Scrutiny Review & Comment

Key Decision: No

Wards Affected: All

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1. EXECUTIVE SUMMARY

- 1.1 This report updates the Board on the reasons and process for the introduction of Individual Electoral Registration (IER).

2. RECOMMENDATIONS

- 2.1 To note the report.
- 2.2 To note that the Director of Finance has made the appropriate declaration in order to secure additional Government funding.

3. INTRODUCTION AND BACKGROUND

- 3.1 The present system of electoral registration is a hybrid of annual canvass and monthly rolling registration outside the canvass period.
- 3.2 The annual canvass usually takes place between August and November, when every household is sent a registration form. One person in the household gives the details of all eligible residents, or the reason why no-one is eligible. This method has been used since the

1880s. The form can be returned by post, fax or scanned to an email; additionally, no change households can confirm details by phone, text or internet. It should be remembered that Hammersmith & Fulham were the first in the UK to offer phone (with three other councils) and internet registration. At the conclusion of the canvass a revised register of electors is published by 1 December.

- 3.3 Rolling registration was introduced in February 2001 and the register is now also updated each month (from January to September). New residents who have moved into, or within, the borough (or become eligible because of a change of nationality) fill in their own registration form – a third party cannot do it for them. Amendments can also be made, for example, a change of name due to marriage. Names can be removed from the register on notification (deaths and other registration officers informing changes of address) or because the registration officer knows that someone is no longer eligible due to them moving out of an address.
- 3.4 Therefore, the system is a mixture of household and individual registration; traditional Victorian and modern e-enabled; and registering everyone at annual canvass and targeting home-movers during the rest of the year.

4. PROPOSAL AND ISSUES

- 4.1 There has been a growing concern in recent years about the method of electoral registration. Annual household registration is seen as anachronistic in today's society. Even in Hammersmith & Fulham, with its high population mobility, around 65% of households do not change from year to year, and residents question why they have to keep re-registering. This was one of the reasons why telephone and internet registration were pioneered in the borough in order to make re-registration easier. Nevertheless, considerable resources are used to register no-change households.
- 4.2 There is also a problem of relying on one person having to complete the registration for a whole household. National studies have shown that this can lead to under-registration (especially of 16 & 17 year olds), and locally there is anecdotal evidence that in shared households of unrelated young people no one completes the registration until a canvasser visits.
- 4.3 Hammersmith & Fulham has large numbers of young adults in rented accommodation. In many cases they have previously been registered either by parents or student accommodation officers and they have to register themselves for the first time.
- 4.4 Electoral fraud is rare in the UK, and unknown in Hammersmith & Fulham. However, the register is used by financial, and other, services as a means of checking identities and residences. This is a powerful

driver for fraud. The Metropolitan Police recently disclosed that of 29,000 forged identity documents they had seized 45% had a corresponding forged entry in the register of electors.

- 4.5 These pressures for modernisation; for individuals to take personal responsibility; and to combat fraud have formed the basis for a change to individual electoral registration (IER).

The legislative background

- 4.6 The Electoral Commission has called for individual registration since 2003. They initially saw the change as an essential building block for e-enabled voting, but the emphasis is now on fraud prevention.
- 4.7 The Political Parties and Elections Act 2009 made provision for a phased implementation, with electors' identifiers (signature, date of birth and National Insurance number) collected on a voluntary basis before 2015. The system would then become compulsory, but only after The Commission had made a recommendation to move to full IER.
- 4.8 In July 2010, before this change could start, the Government announced it would speed up the introduction. IER is to be compulsory from 2014, but with the assurance that anyone who had failed to register individually will not be removed from the register before the fixed date General Election in 2015. A key difference of the proposal is that National Insurance numbers will be checked with the Department of Work and Pensions (DWP) to ensure registration applications are genuine.
- 4.9 The Government's White Paper of June 2011 also raised the important prospect of residents being able to "opt-out" of registering altogether. This was widely opposed in Parliament and by The Commission and electoral administrators, because to the negative impact on registration levels. The idea was dropped and replaced by a civil penalty for non-response to an invitation to register.
- 4.10 In 2011-2013 various pilots were conducted on the usefulness of using national databases to identify residents who were not registered. These pilots proved inconclusive for a range of technical and resources issues. However, it was discovered that data matching could actually be used to confirm the identities of over 65% of electors. Although the pilots did not prove effective at getting people onto the register, this confirmation process has become crucial to the introduction of IER.
- 4.11 The Electoral Registration and Administration Bill was introduced in May 2012, and received Royal Assent on 31 January 2013. The Act provides the administrative framework and the detail has been provided in Regulations which continue to be issued. Crucially, in October 2013 The Electoral Commission published its assessment that

sufficient progress has been made to move to full implementation, and the Minister signed the commencement order on 18 December 2013.

5. THE TRANSITION TIMETABLE

5.1 These are the key events and dates to 2015.

July 2013 – Confirmation Dry Run (CDR)

All local registers of electors matched to DWP database, to assess the likely level of registration activities in 2014 and required resources.

1 October 2013 – postponed annual canvass

Instead of starting the annual canvass in August, all councils are required to start in October. The purpose is to make the register more up to date for activities in 2014. Additional rolling registration updates in October and November.

17 February 2014 – publication of revised register

This moves the annual publication from the usual 1 December, again to ensure more up to date registers for 2014.

22 May 2014 – combined Council and European elections

10 June 2014 – start of IER

All new registrations have to include personal identifiers and have date of birth and National Insurance number verified against DWP. Similarly, any new postal vote application must also include a verifiable individual registration.

10 June 2014 – Confirmation Live Run (CLR)

Hammersmith & Fulham register is matched to DWP database. This will determine actions taken during the summer write-out.

July 2014 – the write-out

Data-matched electors will receive a letter confirming they have been registered individually and need do nothing else.

Unmatched electors will be invited to complete an individual registration form. All postal and proxy voters will be invited to complete an individual registration form.

Household enquiry forms will be sent to households without electors (foreign nationals, empties, etc) and any other cases that the registration officer feels appropriate.

1 December 2014 – publication of revised register

Any resident who has not responded to an invitation to register will be carried forward, ensuring they can vote at the May 2015 General Election.

Any postal or proxy voter who has not registered individually loses their absent vote but is carried forward.

7 May 2015 – General Election

Autumn 2015 – annual canvass

Although the Electoral Registration and Administration Act 2013 enables the Secretary of State to dispense with the annual canvass, this is unlikely to happen so soon. The exact method to be used at this canvass is not clear, but is likely to make use of household enquiry forms to confirm existing electors. All new residents identified on these forms will have to complete individual forms and be verified with DWP.

1 December 2015 – publication of revised register

Any non-responders to invitations to register individually, who were carried forward in December 2014, will now be removed from the register.

6. THE RESULTS OF THE CONFIRMATION DRY RUN (CDR)

- 6.1 Pilots held in 2011-13 showed that nationally 65% of electors could be confirmed by data matching. During the summer all 46 million electors on the register at 1 July 2013 were matched against the DWP's CIS (Customer Information System).
- 6.2 The match was purely on name and address; National Insurance numbers and dates of birth were not involved as these have not yet been collected by registration officers. The results were better than expected with 78% of electors matched. However, match rates varied from 46.9% in Kensington & Chelsea to 86.4% in Mansfield.
- 6.3 The match for Hammersmith & Fulham was 55.4%. A further 13% were "amber" matches – these include cases where there are spelling discrepancies on names, and imprecise matching of addresses. 31.6% of electors did not match on name and address. In terms of electors the figures were – 69,020 matched, 16,210 partially matched, and 39,378 not matched.
- 6.4 It was apparent to officers that there were serious issues with this matching. The annual canvass always has a response of over 95% of households and 85% of homemovers are accounted for during rolling registration. With such high returns we must assume registration in the borough is relatively accurate. The question becomes one of what was the register actually matched against.
- 6.5 DWP clearly had a problem matching addresses, specifically flats and bedsits. Practically all properties on the register have the Local Land and Property Gazetteer's Unique Property Reference Number. DWP are also meant to use these UPRNs, but these have only been added to their data in the last 18 months. Amber matches usually occur when DWP cannot match on address, so they use the postcode instead.
- 6.6 The pilots and CDR results outside London suggest an amber rate of 3-4%. The borough's amber rate of 13% is similar to other Inner London boroughs. The amber rate for Addison ward was 21%, and for Sinclair Road (with 911 electors in that ward) as high as 35.6%.

- 6.7 A quarter of red matches were the result of DWP not matching the address at all – some of the electors in these households would undoubtedly have been green matches if DWP had matched the address. Officers have repeatedly asked for the number of UPRNs DWP holds for Hammersmith & Fulham addresses, but this information has not been supplied.
- 6.8 Apart from address issues, there are also problems with what exactly is in the DWP data. Their CIS data is based on people who have had recent contact with DWP, not necessarily those with National Insurance numbers. This probably accounts for Wormholt and White City ward having the highest green match rate of 71%.
- 6.9 The borough's demographics do not help the matching process. For instance, DWP records students' National Insurance details at their home, or parental, address rather than the term-time address. This will result in non-matches, especially in the numerous student shared houses in the borough. Additionally, the responses from many young people in rented accommodation to requests to register, would suggest they use "home" addresses for conducting their personal affairs, presumably including for National Insurance purposes. There are undoubtedly many people in the borough who have no day to day contact with DWP, except perhaps for child benefits. This probably accounts for cases where female partners are matched, but the male partner is not.
- 6.10 The matching results probably hold interesting information, but little of practical use can be extracted without a disproportionate use of officer time, which can be better employed on other work. The same issues will arise at the Confirmation Live Run in July 2014. However, it should be noted that the Registration Officer does not have to rely on DWP matching. Local data sources can also be used to confirm that electors actually live at an address.
- 6.11 Local matching was carried out on all amber matches and non-matches, using sources such as council tax, benefits, housing rents, parking permits, etc. This produced a match rate of 83.4%, an amber rate of 3.2 %, and 13.4% unmatched. This showed the effect of using UPRNs for accurate address matching, as well as being a better reflection of the accuracy of the register.
- 6.12 The result of the Dry Run points to over 103,000 electors being confirmed in summer 2014. About 20,000 electors will be invited to fill in individual registration forms. Over 90% of postal voters will be confirmed. There is a health warning on these figures, especially as DWP may improve its ability to actually do more complicated matching, and the number of homemovers registered by 1 July 2014 may be reduced because of resources being concentrated on the May elections.

7. RESOURCES

- 7.1 Presently, £83 million is spent on electoral registration in the UK. £108 million has been allocated for the transition to IER, including £22 million to cover the extra costs of the 2014 write-out. Ongoing costs of the new system are estimated at an extra £13 million nationally.
- 7.2 Transitional costs are based on electorates, resident populations, rolling registrations, and Dry Run results, and vary from council to council based on perceived need. The Government is concerned that this funding is not used to cover reductions in core electoral services, and additional monies are available if the Director of Finance confirms that the base budget will not be altered.
- 7.3 Hammersmith & Fulham has been allocated £157,902 for the transition, and this will be increased to £197,377 if the Director of Finance undertaking is given.
- 7.4 The average allocation for England & Wales is 52 pence per elector, and only 15 councils will receive over £1.00 per elector. Hammersmith & Fulham's higher allocation is equivalent to £1.54 per elector, the third highest nationally after Kensington & Chelsea (£1.65) and Westminster (£1.90).
- 7.5 The Electoral Registration team is already recruiting four part-time staff, primarily to cover the extra processing of registration forms. The extra costs of about £25,000 are being met from the existing Electoral Services budget.
- 7.6 Detailed modelling is hampered by many unresolved issues, but a clearer picture should emerge in the next few weeks. An example of uncertainty is registration forms. The Electoral Commission is responsible for all form design – local registration officers will only be able to add council logos and contact details. At one stage the household enquiry form was reported to extend over eight pages long but the Cabinet Office asked for a single sheet.
- 7.7 On 24 December 2013 it was announced that the forms will be of A3 size. This has enormous knock-on effects on printing, postage, scanning and storage. New IT hardware will be essential. The Cabinet Office has said it will meet all additional costs. However, this shows how the overall picture is changing all the time. The Government's allocated funding should be sufficient, but it is unlikely that a clearer picture will emerge until the new registration system has gone live.

8. ONLINE REGISTRATION

- 8.1 One important change arising alongside individual registration should be noted. The Government Digital Service is developing a national online registration service. Currently, 20% of Hammersmith & Fulham

households register electronically at annual canvass. Unfortunately, this cannot be extended to rolling registration, because of the legal requirement for a signed form.

- 8.2 The 2013 Act removes this need for a signature, and finally enables true online registration. A further advantage is that central registrations will be verified against DWP before being passed to local registration officers. A national infrastructure also removes the need, and cost, to maintain local systems.

LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
1.	IER background papers	Zoe Wilkins	Electoral Services